

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

DOUGLAS JOHNSON,

Plaintiff,

v.

**COOK COUNTY SHERIFF THOMAS
DART , in his official capacity,
ANTWAUN BACON, a CCDOC officer,
and COOK COUNTY, a municipal
corporation,**

Defendants.

22 CV 3718

Judge Robert W. Gettleman

**DEFENDANTS' JOINT OPPOSED MOTION FOR EXTENSION OF TIME
FOR BRIEFING OF DISPOSITIVE MOTIONS**

NOW COME Defendants, ANTWAUN BACON, by and through his attorneys, Jason E. DeVore and Zachary G. Stillman, of DeVore Radunsky LLC, and COOK COUNTY SHERIFF THOMAS DART, and COOK COUNTY, a body politic and corporate, by and through their attorneys, pursuant to Fed. R. Civ. P. 6(b), and for Defendants' Joint Opposed Motion for Extension of Time for Briefing of Dispositive Motions, state as follows:

1. This is the first request by any party for an extension regarding the dispositive briefing schedule.
2. Counsels for all parties have been in communication regarding this Motion and Counsels for Plaintiff have made their intended opposition clear.
3. On January 14, 2025, this Court issued an Order setting the following dispositive motion schedule: Motions due by March 14, 2025; Responses due by April 11, 2025, and Replies due by April 25, 2025. (ECF No. 72.)
4. Defendants have met and now jointly agree that they need additional time to draft their dispositive motions at present because of their schedules.

5. Accordingly, the parties now request an 8 (eight) week extension to all deadlines, up to and including the following dates: Motions due by May 9, 2025; Responses due by June 6, 2025, and Replies due by June 20, 2025.
6. Under Rule 6(b), this Court may, for good cause, extend the time “[w]hen an act may or must be done.” Fed. R. Civ. P. 6(b).
7. Not granting the requested extensions of time would prejudice the parties because the current deadlines will not allow sufficient time to properly prepare and submit their briefs.
8. Granting an extension of time will not prejudice any party and this motion is not brought for undue delay or any improper purpose.

WHEREFORE, Defendants respectfully request that this Honorable Court enter an order as follows:

1. Defendants’ Motion for Extension of Time is granted;
2. Dispositive Motions are due by May 9, 2025; Responses due by June 6, 2025, and Replies due by June 20, 2025; and
3. Any other such relief as this court deems reasonable and just.

Respectfully Submitted,

Defendants

By: /s/ Zachary G. Stillman
Zachary G. Stillman, One of the
Attorneys for Defendants

DEVORE RADUNSKY LLC

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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that the above Opposed Motion for Extension of Time was filed on February 28, 2025, with the Northern District of Illinois ECF System, serving a copy to all parties.

/s/Zachary Stillman
Zachary Stillman